

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

ANGELA MANSON, and
TERI GREEN,

Plaintiffs,

VS.

THOMAS E. ROBINSON, and
ROANE TRANSPORTATION SERVICES,
LLC,

Defendants.

Case No.

JURY TRIAL DEMANDED

NOTICE OF REMOVAL

COME NOW Defendants, Thomas E. Robinson and Roane Transportation Services, LLC, by and through their attorneys Roberts Perryman, P.C., and hereby file their Notice of Removal stating the following:

INTRODUCTION

1. A civil action has been commenced and is now pending in the Circuit Court of St. Charles County, State of Missouri, Case No. 2211-CC00404, wherein Angela Manson and Teri Green are the Plaintiffs and Thomas E. Robinson and Roane Transportation Services, LLC, are the Defendants.

2. This action is a civil action wherein Plaintiffs have made claims for damages as a result of Defendants alleged negligence and negligence per se in connection with a tractor trailer motor vehicle accident that occurred on June 8, 2020.

3. Plaintiff Angela Manson was and is a citizen of Missouri.

4. Plaintiff Teri Green was and is a citizen of Missouri.

5. Defendant Thomas E. Robinson was and is a citizen of South Carolina.

6. Defendant, Roane Transportation Services, LLC, is a Tennessee limited liability company with its principal place of business in Tennessee. Both members of the LLC are citizens of Tennessee.

DIVERSITY OF CITIZENSHIP EXISTS

7. This action is a civil action, of which the United States District Courts have original jurisdiction pursuant to 28 U.S.C. § 1332 and is one which may be removed to this Court by Defendant pursuant to 28 U.S.C. § 1441, and this is a civil action proceeding involving diversity of citizenship.

8. Plaintiff, Angela Manson, is a citizen of the State of Missouri.

9. Plaintiff, Teri Green, is a citizen of the State of Missouri.

10. Defendant, Roane Transportation Services, LLC, is a limited liability company with its principal place of business in Tennessee. All members are also citizens of Tennessee.

11. Defendant, Thomas E. Robinson, is a citizen of South Carolina.

THE AMOUNT IN CONTROVERSY HAS BEEN SATISFIED

12. The amount in controversy exceeds \$75,000.00 exclusive of interest and costs for each Plaintiff. Plaintiff Angela Manson is claiming serious injuries to her abdomen, spine, head, shoulder, and left knee along with medical expenses, future medical expenses and treatment, and pain and suffering. Plaintiff, Teri Green is claiming serious injuries to his neck, spine, and right shoulder along with medical expenses, future medical expenses and treatment including a future neck surgery, and pain and suffering. Plaintiffs have made a combined policy limit demand of over \$1.0 million, which is an amount that substantially exceeds the amount in controversy threshold. Plaintiffs further will not agree to stipulate their individual damages are less than \$75,000.00

NOTICE OF REMOVAL IS TIMELY

13. Less than thirty (30) days have elapsed since receipt of said initial pleadings by Defendants.

14. Defendants file herewith a copy of all process, pleadings, and order each has received in this action. *See Exhibit A.*

WHEREFORE, Defendants Thomas E. Robinson and Roane Transportation Services, LLC, by and through counsel, pray the Court to accept their Notice for Removal, and make and enter such orders as may be necessary to affect the complete removal of this action from the Circuit Court of St. Charles County, State of Missouri, to the United States District Court for the Eastern District of Missouri, and that further proceedings be discontinued in the State Court and all future proceedings be held in this Court, as the laws in such case provide.

Respectfully submitted,

ROBERTS PERRYMAN P.C.

/s/ Ted L. Perryman

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 20th day of June 2022, copies of the foregoing were served on the following counsel of record via the Court's ECF filing system:

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